

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

MAR 10 1998

FILED
COMMUNICATIONS SECTION

In the Matter of)

Application of WorldCom, Inc. and)
MCI Communications Corporation for)
Special Authority To Transfer Control)
of MCI Communications Corporation)
to WorldCom, Inc.)

CC Docket No. 97-211

To: The Commission

**COMMENTS OF TMB COMMUNICATIONS, INC.
ON WORLDCOM / MCI'S JOINT REPLY**

TMB Communications, Inc. ("TMB"), through its counsel and pursuant to Section 1.45 of the Commission's rules and the Commission's request for Comments on WorldCom/MCI's Joint Reply in the above-referenced proceeding,^{1/} hereby files these Comments urging the Commission to deny the proposed merger because it would be contrary to the public interest by, among other things, creating and reinforcing barriers to entry for small businesses.

**I. THE COMMISSION SHOULD EXPAND THE SCOPE
OF ITS INQUIRY INTO THE PROPOSED MERGER.**

The March 10, 1998, edition of the Wall Street Journal reported that the Justice Department has widened its investigation of the proposed WorldCom/MCI merger.^{2/} TMB strongly encourages the Commission to do the same. The Communications Act gives the

^{1/} In the Matter of Application of WorldCom, Inc. and MCI Communications Corporation for Transfer of Control of MCI Communications Corporation to WorldCom, Inc., *Order*, CC Docket No. 97-211, DA 98-384, released Feb. 27, 1998 (hereinafter "*Order*").

^{2/} John R. Wilke and Jared Sandberg, *WorldCom, MCI Probe Is Widened*, Wall St. J., March 10, 1998, at A3.

Commission authority to consider the impact of its decision on small business interests.^{3/} While TMB applauds the Justice Department for expanding its investigation into the proposed merger, TMB remains concerned because the Justice Department's focus is solely on antitrust concerns. The FCC, however, has explicit authority to consider broader public interest considerations, including the proposed merger's likely impact on small businesses. Accordingly, the Commission should thoroughly examine the proposed merger's impact on small businesses. If the Commission fails to do so, no other government agency will take this critical factor into account.

Widening its inquiry into the proposed merger is consistent with the Commission's approach toward small businesses. Recognizing that small businesses play a "crucial" role in the U.S. economy, the Commission has undertaken several initiatives to increase opportunities for entry and expansion of small businesses in telecommunications markets.^{4/} The Commission has also recognized that, based on its licensing information and other statistical data, small businesses encounter market entry barriers.^{5/} Congress has directed the Commission to eliminate those barriers.^{6/} Accordingly, the Commission must not grant a transfer of control when the evidence demonstrates that one of the parties to the transfer has systematically engaged in

^{3/} See 47 U.S.C. § 309(j) (1996); 47 U.S.C. § 257 (1996) (the Commission must "promote the policies and purposes of this Act favoring diversity of media voices, vigorous economic competition, technological advancement, and promotion of the public interest, convenience and necessity").

^{4/} See Section 257 Proceeding to Identify and Eliminate Market Entry Barriers for Small Businesses, *Report*, FCC 97-164, released May 8, 1997, at ¶ 5.

^{5/} Section 257 Proceeding to Identify and Eliminate Market Entry Barriers for Small Businesses, *Notice of Inquiry*, 11 FCC Rcd 6280, 6301 (1996).

^{6/} 47 U.S.C. § 257 (1996).

anticompetitive conduct toward small businesses in an effort to prevent those small businesses from competing against it.

II. PAST EXPERIENCE DEMONSTRATES THAT MCI ENGAGES IN PREDATORY ACTS AGAINST SMALL BUSINESSES.

In the Order establishing an additional pleading cycle for parties to comment on the Joint Reply, the Commission specifically requested comment on “the actual, potential, and precluded competitors in these markets, [and] a description of any barriers to entry or expansion into these markets” that would result from the proposed merger.^{7/} MCI has historically waged campaigns to eliminate competitors from the marketplace by engaging in anticompetitive acts. Allowing MCI to merge with WorldCom would concentrate resources in one very large company that could wield enormous power to create significant entry barriers for small businesses seeking to enter the same or related market(s).

As TMB fully described in its Petition to Deny,^{8/} MCI engaged in a pernicious course of conduct against TMB during the time that TMB acted as MCI’s authorized agent, reselling MCI products and services. Specifically, MCI refused to install, or interrupted installation of, equipment requested by TMB’s customers.^{9/} Consequently, TMB’s customers either did not receive the discounted prices offered by TMB, or received such poor service from MCI that they

^{7/} *Order* at 2.

^{8/} *See* Petition to Deny filed by TMB Communications, Inc., CC Docket No. 97-211 (Jan. 5, 1998).

^{9/} *See, e.g.*, Correspondence from Doug Bradshaw to Darlene Rhyne, dated Oct. 27, 1994; Correspondence from Darlene Rhyne to Doug Bradshaw, dated Sep. 26, 1994; and Correspondence from Frank Mitchell to Debi Keck, dated Dec. 20, 1993, attached as Exhibit 1 hereto.

were in effect harmed because they took advantage of TMB's lower prices.^{10/} This, in turn, caused TMB to lose customers.^{11/}

MCI's predatory acts against TMB are just one example of MCI's deliberate attempts to minimize competition and growth in the telecommunications industry. A combined MCI/WorldCom entity would be engaged in business in virtually every aspect of the industry, and would be able to stifle small business competitors in the provision of many different types of telecommunications service, not just telephony.^{12/} The Commission found in its Section 257 proceeding that "[m]any of the obstacles identified by small businesses in the common carrier services relate directly to control of vital inputs by incumbent carriers.... Examples of such barriers include: incumbent LEC refusal to comply with interconnection obligations, onerous conditions, such as high deposits for resale; incumbent LEC monopoly control over subscriber list information; and incumbent LEC control and assignment of NXXs."^{13/} MCI uses its existing market power to disadvantage competitors and their customers. Consequently, MCI's actions pose a significant barrier to entry, and MCI should not be rewarded by allowing it to merge with WorldCom and thereby gain even greater market power.

^{10/} See, e.g., Correspondence from Doug Bradshaw to Cary Brown, dated Oct. 4, 1994, attached as Exhibit 2 hereto.

^{11/} See, e.g., Letter from Maria E. Robinson to Mr. William Kennard, dated Jan. 26, 1998; and Customer Profiles for Tempaco, Inc., Caribbean Pacific, Inc., and Hill & Ponton, attached as Exhibit 3 hereto.

^{12/} See, e.g., Letter from R. Michael Senkowski to Magalie Roman Salas, dated March 3, 1998, HHI Effects of the Proposed WorldCom/MCI Merger (demonstrating the amount of telecommunications market shares WorldCom and MCI will have if the proposed merger is consummated) (on file with the FCC).

^{13/} Section 257 Proceeding to Identify and Eliminate Market Entry Barriers for Small Businesses, *Report*, FCC 97-164, released May 8, 1997, at ¶82.

III. THE PROPOSED MERGER IS CONTRARY TO THE PUBLIC INTEREST, CONVENIENCE AND NECESSITY.

Commission precedent mandates that a party seeking Commission approval for a transfer of license or other authorization must demonstrate that the proposed transaction is in the public interest, convenience and necessity.^{14/} MCI cannot make that showing. MCI's anticompetitive acts not only pose a market entry barrier for small businesses, but also harm the customers who sign up for MCI products and services through MCI's authorized agents. This is clearly not in the public interest.

Customers are harmed by MCI's anticompetitive and predatory acts in numerous ways. First, MCI's conduct deprives customers of the benefits agents can offer them. The agents are better able to package MCI's service to fit the customers' needs than either the customers or MCI. The agents are more familiar with MCI's products and services than the customers, and the small number of customers that the agents have enables them to work more closely with the customers to determine their needs than MCI ever could. Second, MCI's behavior deprives customers of the discounts agents can offer them.^{15/} The agents are able to buy MCI products and services in bulk and thereby obtain discounts that they pass on to customers. Customers cannot enjoy these discounts and must pay higher rates for the same service when they are forced to obtain service directly from MCI.

TMB raised this concern in its Petition to Deny; MCI and WorldCom did not even deign to respond on the merits. Instead, they made only one passing reference to it, on page 96 of their

^{14/} See, e.g., Application of NYNEX Corp., Transferor, and Bell Atlantic Corp., Transferee, for Consent to Transfer Control of NYNEX Corp. and Its Subsidiaries, *Memorandum Opinion and Order*, 12 FCC Rcd 19985, 19987 (1997).

^{15/} See, e.g., Correspondence from Myrielle Grandchamps to Jim Lenhart, dated June 24, 1996, attached as Exhibit 4 hereto.

99-page Joint Reply, obliquely asserting that this is not the proper forum for TMB's "private contractual dispute."^{16/} TMB's concerns beyond a "private contractual dispute" and raise a material question of fact as to whether MCI would continue to engage in these anticompetitive and predatory acts if allowed to merge with WorldCom, and thereby continue to harm small businesses and the public. Evidently, MCI treats allegations of harm to small businesses and the public as merely contractual disputes, and fails to appreciate how the contractual disputes are illustrative of MCI's pervasive industry practices that impose barriers to entry and harm the public interest. Clearly, then, MCI is not attempting to serve the public interest, convenience and necessity.

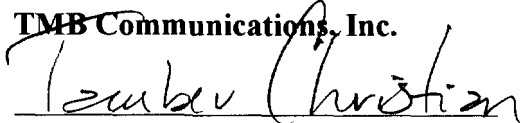
IV. CONCLUSION

MCI's conduct raises a substantial question of whether the proposed merger would create and reinforce barriers to entry for small businesses and, as a result, harm the public interest. Consequently, the Commission should not approve the proposed merger as contrary to the public interest, convenience and necessity.

Respectfully submitted,

TMB Communications, Inc.

By:



Thomas A. Hart, Jr.

M. Tamber Christian

Amy E. Weissman

GINSBURG, FELDMAN AND BRESS, CHTD.

1250 Connecticut Avenue N.W.

Washington, D.C. 20036

202-637-9000

Dated: March 13, 1998

^{16/} Joint Reply of WorldCom, Inc. and MCI Communications Corporation to Petitions to Deny and Comments, CC Docket No. 97-211, p. 96 (Jan. 26, 1998).

EXHIBIT 1

via: mailbox 1, roytanner on MCI ** Message Received OK
Date: Tue Sep 27, 1994 8:07 am EST
Source-Date: Tue Sep 27, 1994 9:10 AM EST
From: TMB Communications - Doug Bradshaw / MCI ID: 654-2258
TO: Darlene Rhyne / MCI ID: 443-2807
CC: * Telemangement Brokers / MCI ID: 501-2240
Subject: Adventure Resorts of America
Message-Id: 72940927130727/0006542258PK1EM

10/27/94

Darlene,

E-mails with reference of doing a data fix for ARA refers to only account # 08601399305. It is my understanding ANI traffic is showing on both accounts thus, doesn't account #08606464433 "also" have to have a data fix ???

Mr. Hal Parks also informed me that he will be holding his next invoice until he hears from MCI upper management on the credit request he faxed to you on 9/1/94.

It also might be a good idea to let him know that the data fix has taken us more that a month to do and that he will receive another invoice with no account codes.

Doug Bradshaw

via: mailbox 1, roytanner on MCI ** Message Received OK
Date: Mon Sep 26, 1994 4:46 pm EST **RECEIPT
From: Darlene Rhyne / MCI ID: 443-2807
TO: TMB Communications - Doug Bradshaw / MCI ID: 654-2258
TO: * Telemangement Brokers / MCI ID: 501-2240
CC: Kjerstin Terry / MCI ID: 444-5067
CC: Darlene Rhyne / MCI ID: 443-2807
CC: Cheryl R. Thompson / MCI ID: 375-4498
Subject: ADVENTURE RESORTS
Message-Id: 31940926214613/0004432807NA2EM

Doug,

As I informed you last week, we did escalate the request for the data fix to be done on the old account for Adventure Resorts.

We were advised this would be completed by Friday. We have been advised again today Monday, September 26th, that the data fix is still pending. I will update you daily on this issue until it has been resolved and the new account established.

Darlene Rhyne
/

Date: Mon, 20 Dec 1993 12:12
Via: 1
To: DEBI KECK
Subject: CRITICAL SERVICE ISSUES
Cc: ARLA MOSKOWITZ
Cc: WJOSCELYN
Cc: SHARON WELLS

DEAR DEBBIE,

WE ARE REQUESTING YOUR DIRECT ATTENTION TO THE FOLLOWING ISSUES.
WE HAVE GONE THROUGH THE CHANNELS AND ESCALATION PROCESS AND NEED YOUR FURTHER ASSISTANCE TO RESOLVE THESE.

1. INTEGRTEL:

A T-1 SOLD IN NOVEMBER 1993 WITH 800 ORIGINATION FROM MEXICO. THEY ARE PROJECTING 225,000 MINUTES PER MONTH TRAFFIC AND HAVE CURRENTLY SIGNED 40 HOTELS ON CONTRACTS. THEY ARE SIGNING A VIP PLUS AND ON DECEMBER 20TH SIGNED FOR A POINT TO POINT T-1 FOR U.S. TRAFFIC. THE CRITICAL POINT IS IN EARLY DECEMBER, WHEN THE T-1 WAS COMPLETED, WE WERE INFORMED THAT THERE WAS A PROBLEM WITH 800 MEXICAN ORIGINATION. TMB AND ALTERNATE CHANNELS HAVE ATTEMPTED SEVERAL ESCALATION PROCESSES BUT CANNOT GET A DEFINITE ANSWER FOR THE CUSTOMER. THEY ARE ASKING TO TALK WITH SOMEONE IN MCI MANAGEMENT OR MCI ENGINEERS.

2. ADVENTURE RESORTS:

THEY HAVE HAD A BILLING PROBLEM FOR SEVERAL MONTHS AND CANNOT RE-BILL CLIENTS AS A RESULT. THE CUSTOMER OVERNIGHTED AN INVOICE TO ALTERNATE CHANNELS TO SUBMIT TO BILLING. THEY NOW AGREE TO AND KNOW WHAT THE PROBLEM IS BUT IT HAS BEEN NINE WORKING DAYS AND ARLA CANNOT GET AN APPROPRIATE ANSWER FROM BILLING. BECAUSE OF HIS RE-BILLING PROBLEM, AND THE FACT THE CUSTOMER WANTS THIS SOLVED, THIS HAS BECOME A CRITICAL SITUATION. THIS IS A FOUR MONTH OLD ISSUR.

I WILL BE CALLING YOU WITHIN THE NEXT 24 HOURS TO DISCUSS THE DETAILS.

SINCERELY,
FRANK MITCHELL

EXHIBIT 2

via: mailbox 1, royttanner on MCI ** Message Received OK
Date: Tue Oct 04, 1994 9:20 am EST
Source-Date: Tue Oct 04, 1994 10:23 AM EST
From: TMB Communications - Doug Bradshaw / MCI ID: 654-2258
TO: * Telemanagement Brokers / MCI ID: 501-2240
Subject: Adventure Resorts of America
Message-Id: 31941004142013/0006542258PK3EM

To: Cary Brown
From: Doug Bradshaw
Subject: Adventure Resorts of America

Cary,

After doing this E-mail to Kjerstin Terry this morning I received another message, on my voice mail, from Mr. Hal Parks(Adventure Resorts of America) He stated that he just received another invoice with the "same problem", as you recall ARA has Two(2) invoices now because back in December of last year we were promised that they would boot up a new account to resolve their billing problem.

As of this date I find that I can no longer service this account, for even I have a certain amount of professionalism, and the situation that exists on this account, I feel, will never be resolved. I further find it impossible to communicate back to Mr. Parks that something is done to correct this problem. Plus since I get personally involved with my accounts, I find that this situation has put an enormous amount of stress on me and has taken away from my ability to perform at the level I expect of myself.

Thus, I am sending by UPS today all of ARA's files to TMB. If you decide to service this account or pass it back to Alternate Channels, it should be imperative that someone contact Mr. Parks @ 904-685-2102 ASAP!!!!!!!!!!!!

Doug Bradshaw
Agent/TMB

via: mailbox 1, royttanner on MCI ** Message Received OK
Date: Tue Oct 04, 1994 12:36 pm EST
From: Kjerstin Terry / MCI ID: 444-5067
TO: * Telemanagement Brokers / MCI ID: 501-2240
CC: William F. Joscelyn / MCI ID: 257-8008
Subject: (Forwarded) ADVENTURE RESORTS OF AMERICA / 99170882
Message-Id: 03941004173630/0004445067MA2EM

Cary,

Per our conversation on Friday, Adventure Resorts' problem is unfortunately not unique to them. As I explained to you the root problem was not identified by the SE group until recently. In order to correct this customer's billing the SE group will have to perform a data fix. I have escalated the data fix however, we do not have a date of completion.

I will keep you updated on a daily basis as to the status of the account.

BT

Forwarded message

via: mailbox 1, KTERRY on MCI ** Message Received OK
Date: Mon Oct 03, 1994 1:41 pm GMT
From: Telemanagement Brokers / MCI ID: 501-2240
TO: * Kjerstin Terry / MCI ID: 444-5067
CC: William F. Joscelyn / MCI ID: 257-8008

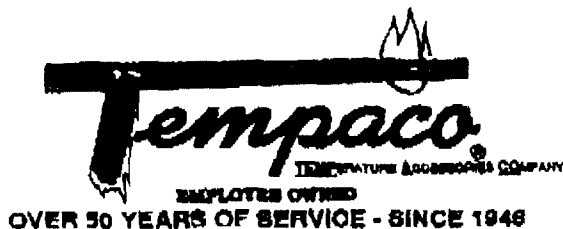
Message-ID: 43341003134134/0005012240PK1RM

WHEN CAN I GUARANTEE THIS ACCOUNT A SOLUTION TO THEIR ACCOUNT CODE PROBLEMS?
PLEASE LET ME KNOW WHEN I CAN GET AN ANSWER TO THIS CUSTOMER. TMB IS NOT
INTERESTED IN ESCALATING THIS PROBLEM, JUST IN GETTING IT FIXED. WE HAVE BEEN
WAITING ALMOST 12 MONTHS FOR A SOLUTION - NEED I SAY MORE?

ARY BROWN
TMB COMMUNICATIONS

nd forwarded message

EXHIBIT 3



PostNet Fax Note	7671	Date	3-13-98
To	FRANK MITCHELL	From	MARQUETTE
Co./Dept.		Co.	
Phone #		Phone #	
Fax #	444-3824	Fax #	

January 26, 1998

Mr. William Kennard
Chairman
Federal Communications Commission
1919 M. Street, NW
Washington DC 20554

Re: Worldcom, Inc. and MCI Communications Corporation for Special
Authority to Transfer Control of MCI Communications Corp. to
Worldcom, Inc.

Docket No. 97-211

Dear Mr. Chairman:

Tempaco, Inc is a wholesale distributor of HVAC in the southeast United States. We would like to take this opportunity to relate our experiences with MCI and TMB Communications, Inc. In late 1996, it became obvious to us that we could not continue our long-term relationship with MCI. Please refer to our letter to TMB, Communications enclosed.

MCI made it impossible for us to get reliable service from them or TMB. As you can see from our letter, we experienced a very disruptive level of service. In addition, we were charged by MCI higher rates than we contracted with them over a long-term contract. To say our relationship with MCI was less than positive is an understatement.

Please consider our input when making your decision on this merger. We appreciate your time and consideration.

Respectfully,


Maria E. Robinson
Chief Financial Officer

CUSTOMER NAME: Tempaco, Inc.
CUSTOMER PROFILE: Heating, Ventilation and Air Conditioning Wholesaler
Average monthly billing of \$3,000 per month.

This customer made several complaints to TMB that they were not receiving proper service from MCI. TMB, in its role of advocating for its customers, alerted MCI of Tempaco's issues and concerns, instead of responding to Tempaco's issues, MCI harassed TMB for advocating for Tempaco.

Tempaco eventually cancelled their account with MCI but their problem did not stop there. MCI continued to send them bills and although the bills were not accurate, MCI did not rectify this problem either. Since MCI made it impossible for TMB to help its customers, Tempaco felt that their only option was to hire an attorney to resolve their issues with MCI.

Giving MCI one last chance to fix the problems without going through litigation, Tempaco wrote to MCI to formally explain the problems and filed a complaint to the FCC. Tempaco continued to receive bills, collection letters and phone calls from MCI.

CUSTOMER NAME: Caribbean Pacific, Inc.

CUSTOMER PROFILE: Skin and Hair Care Products Retailer

Average Monthly Billing of \$2,000 per month

TMB signed this customer for MCI service. Based on this customer's long distance usage and our understanding of the marketplace, we knew that the customer deserved a more competitive pricing. We also knew that MCI had the capability to offer more competitive pricing.

TMB in our role as an agent, always fighting to ensure that the customer gets the most competitive MCI pricing, sent a E-Mail to MCI asking that this customer be put on MCI's CTP (Constant Term Promotion), which would give the customer discounts of 33 1/3 off the base rates. MCI rejected our request, in favor of a less competitive and more profitable rate for MCI. In addition, this customer lost more savings as a result of MCI's failure to port the customer's 800 number for months. Only after TMB performed a due diligence and determined that the customer was not receiving adequate discounts, did we discover MCI's error. By this time, the customer has lost several months of savings.

CUSTOMER NAME: Hill & Ponton

CUSTOMER PROFILE: Law Firm

Average monthly billing of \$1,800

Hill & Ponton was a loyal customer of TMB from 1991 on the MCI Vision service. In 1996 attempted to secure a VIP discount for this customer, recognizing that the customer deserved that product to be in line with the market place. TMB also recognized that MCI made considerable money on this customer and should not deny this customer competitiveness. The attached E-Mails from Myrielle Grandchamps of TMB to Jim Hinnant, Mike Petzold and James Lenhart of MCI describe TMB's advocacy and demonstrate MCI's conscious denial of competitiveness to a customer on whom MCI has made considerable profit over the years. Realizing the both TMB and the customer are (through relationship) captive, MCI's delivery of poor service to TMB's customers and its manipulation of TMB's service offerings result in customers paying more and receiving poorer quality.

Other examples of poor MCI service and billing problems which have harmed our customers and contributed to the demise of TMB's business are represented in E-Mails re: Adventure Resorts of America.

EXHIBIT 4

01/24/1995 22:59 6173414328

FRANK MITCHELL

PAGE 05

06-24-96

From: JAMES LENHART

09:26 AM

From: MYRIELLE L. GRANDCHAMPS \ MCI Mail: (Myrielle L. Grandchamps /
MCI ID:

207-7157)

To: Jim Lenhart \ MCI Mail: (JLENHART / MCI ID: 728-2700)

Subject: Hill & Ponton, PA

Jim,

Thank you for the paperwork you overnighted, however, the customer is not going to sign the paperwork at 17.5% because this percentage is not competitive enough.

The discount of 25% was requested because this is what is required to keep this customer. We cannot ask the customer to increase their annual commitment because they are not expecting a substantial growth in their long distance.

This customer has been on MCI service since 1991 and they know that they have not always received MCI's best rates so we need to demonstrate that we will respond to their needs for best rates before we work the issue of term with them.

The customer feels that MCI has not been hurt in this relationship and also feel that being on MCI service for over five years already demonstrates their willingness to stay on service with us. They could have accepted the competitor's offer but decided to give MCI the opportunity to keep their business.

Jim, 25% is what is required to keep this customer. I need your help on this one, you and I both know that it can be done. I hope to be able to get back to this customer by early next week to let them know that we will be able to keep their business. In such a competitive market, very few customers are loyal enough to give anyone a chance to counteroffer.

Thanks for your help,
Myrielle

----- REPLY, Original message follows -----

> Date: Wednesday, 19-Jun-96 07:56 AM

>

> From: JAMES LENHART \ MCI Mail: (728-2700)

> To: MYRIELLE L. GRANDCHAMPS \ MCI Mail: (MGRANDCHAMPS / MCI ID:
> 207-7157)

> cc: Mike Petzold \ MCI Mail: (Mike Petzold / MCI ID:
> 596-2132)

> cc: JAMES HINNANT \ MCI Mail: (547-1689)

>

> Subject: Fwd: Hill & Ponton, PA

>

06-24-96

From: JAMES LENHART

09:26 AM

Date: Monday, 24-Jun-96 09:26 AM

From: JAMES LENHART \ MCI Mail: (728-2700)
To: MYRIELLE L. GRANDCHAMPS \ MCI Mail: (MGRANDCHAMPS / MCI ID:
207-7157)
cc: Thomas Senters \ MCI Mail: (Thomas Senters / MCI ID:
340-5040)
cc: Mike Petzold \ MCI Mail: (Mike Petzold / MCI ID:
596-2132)

Subject: Fwd: Re: Fwd: Hill & Ponton, PA

Myrielle, BA willing to increase discount from 17.5% to 20% to save this customer. Please review Geoff's (BA) response and advise. Again, I suggest you have have customer renew on either 2 or 3 year VIP to reach desired level of discount.

----- FORWARD, Original message follows -----

Date: Friday, 21-Jun-96 04:52 PM

From: Geoffrey Levy \ MCI Mail: (Geoffrey Levy / MCI ID:
209-2513)
To: Jim Lenhart \ MCI Mail: (JLENHART / MCI ID: 728-2700)

Subject: Re: Fwd: Hill & Ponton, PA

Jim,

Because the intrastate usage is high, this deal is not profitable beyond a 20% CPR. So, I'll go to 20% - but that is it. I would rather force them to complete their current deal at their current rates than lose money on a new deal

Geoff

----- REPLY, Original message follows -----

Date: Friday, 21-Jun-96 06:22 AM

From: Jim Lenhart \ MCI Mail: (728-2700)
To: Geoffrey Levy \ MCI Mail: (Glevy / MCI ID: 209-2513)

Subject: Fwd: Hill & Ponton, PA

Geoff, this is an old CPR that we are still trying to get closed. Any chance for additional savings in order to save this \$1800. customer?? This is against AT&T. Have asked agent to go back and increase term commitment from customer. ----- FORWARD, Original message follows -----


Date: Thursday, 20-Jun-96 08:25 AM

CERTIFICATE OF SERVICE

I, BARBARA GUZZY, a member of the staff of Ginsburg, Feldman and Bress,
Chartered, hereby certify that a copy of the foregoing Comments of TMB Communications, Inc.
on WorldCom/MCI's Joint Reply was hand-delivered to the following this 13th day of March,
1998:

Janice M. Myles
Common Carrier Bureau
Room 544.
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

International Transcription Services, Inc.
1231 - 20th Street, N.W.
Washington, D.C. 20036


Barbara Guzzly